

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
COURT FILE NO.: 10-CV-4186 (SRN/FLN)**

---

Cathleen Poechmann and others in similar situations,

Plaintiff,

v.

Alerus Financial, National Association,

Defendant.

---

**PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

The above-named parties, by and through their attorneys of record, pursuant to Federal Rule of Civil Procedure 23, respectfully move this Court for an Order granting preliminary approval of a class action settlement of all claims, and entry of a final judgment, in accordance with the terms that will be set forth more fully in the Stipulation of Settlement.

Dated this 2<sup>nd</sup> day of May, 2011.

**ATTORNEYS FOR PLAINTIFF**

By: s/Thomas J. Lyons

**LYONS LAW FIRM, P.A.**

Thomas J. Lyons, Sr., Esq.

Attorney I.D. # 65699

367 Commerce Court

Vadnais Heights, MN 55127

Telephone: (651) 770-9707

Facsimile: (651) 770-5830

[tlyons@lyonslawfirm.com](mailto:tlyons@lyonslawfirm.com)

**THE CONSUMER ADVOCACY  
CENTER, P.C.**

Lance Raphael, Esq.

180 West Washington, Suite 700

Chicago, IL 60602

Telephone: (312) 782-5808

Facsimile: (312) 377-9930

[lance@caclawyers.com](mailto:lance@caclawyers.com)